

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:21CR226
	)	
Plaintiff,	)	JUDGE PAMELA A. BARKER
	)	
v.	)	
	)	
DAVIS LU,	)	<u>ADDENDUM TO STIPULATED</u>
	)	<u>PROTECTIVE ORDER (ECF DOC. #18)</u>
Defendant.	)	

Defense counsel and the Government hereby agree to amend the Stipulated Protective Order (ECF Doc. #18) by extending its provisions to cover any documents or materials produced by any individuals, agencies, corporations, or similar entities (collectively, “third parties”) in response to valid legal requests, including properly issued subpoenas and/or Court Orders. Accordingly, any documents, materials, recordings, or other items produced by such third parties shall be considered Protected Discovery Materials – as that term is defined in the Stipulated Protective Order (ECF Doc. #18, ¶1) – and subject to the same protections and restrictions set forth in the Stipulated Protective Order, including Paragraphs 2a-2i, which prescribe the retention, maintenance, dissemination, and review of Protected Discovery Materials. (ECF Doc. #18). Similarly, the provisions in the Stipulated Protective Order governing the notification requirements (ECF Doc. #18, ¶4) and agreement to return any Protected Discovery Materials at the conclusion of the case (ECF Doc. #18, ¶5) apply with equal force to any Protected Discovery Materials provided by third parties, except that any Protected Discovery Materials disclosed will be returned directly to the third party who produced them in the first instance.

It is so agreed and stipulated by the undersigned parties, this 3rd date of November, 2022.

**SO ORDERED, THIS 3rd Day of November 2022**



HONORABLE PAMELA A. BARKER  
United States District Court Judge

**AGREEMENT TO THE STIPULATED PROTECTIVE ORDER and ADDENDUM**  
**in UNITED STATES v. DAVIS LU, Case No. 1:21-CR-226 (Barker)**

I, \_\_\_\_\_, the undersigned, hereby acknowledge and declare that I have received a copy of the Stipulated Protective Order in *United States v. Davis Lu*, Case No. 1:21-CR-226 (Barker), dated October 21, 2021, as well as the Addendum dated November \_\_\_, 2022, and have read, understand, and hereby agree to the terms and provisions of those documents, and hereby agree and submit to the jurisdiction of the United States District Court for the Northern District of Ohio for the purposes of enforcement of the terms of the Stipulated Protective Order and Addendum as well as the punishment for any violations thereof.

DATED: \_\_\_\_\_, 2022.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_